

ADDENDUM TO THE FACT SHEET
FOR NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM (NPDES)
PERMIT NO. WA0037095

I. GENERAL INFORMATION

Facility: Grays Harbor County - Pacific Beach Wastewater Treatment Plant
P.O. Box 511
Montesano, WA 98563

II. APPLICATION REVIEW

An application for permit reissuance was submitted to the Department of Ecology (Department) on February 19, 2003, and resubmitted on April 24, 2003, and accepted by the Department on May 5, 2003. The scope and manner of any review of an application for replacement of permit by the Department shall be sufficiently detailed as to insure the following:

- That the permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- That the Department has up-to date information on the permittee's production levels; permittee's waste treatment practices; nature, content, and frequencies of permittee's discharge; either pursuant to the submission of new forms and applications or pursuant to monitoring records and reports resubmitted to the Department by the permittee; and
- That the discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in WAC 173-216 and WAC 173-200.

The application for Grays Harbor County - Pacific Beach Wastewater Treatment Plant was reviewed and indicates that no changes in the treatment characteristics of the effluent process or volume of wastewater has occurred.

III. PERMIT REAUTHORIZATION

This fact sheet addendum accompanies the draft permit, which is to be reauthorized to Grays Harbor County - Pacific Beach Wastewater Treatment Plant for the discharge of wastewater to a tributary to Joe Creek (via a created wetland). The previous fact sheet is also part of this administrative record and explains the basis for the discharge limitations and conditions of the reauthorized permit.

The existing permit requirements, including discharge limitations and monitoring, do not need to be changed to protect the receiving water quality. The previous fact sheet addressed conditions and issues at the facility at the time when the previous permit was issued, and statements made reflected the status in 1998. Since the issuance of the current permit, the Department has not received any information which indicates that environmental impacts from the discharge that were not evaluated at the time of the last permit issuance is persuasive enough to undertake a

complete renewal of the permit. The reauthorized permit is virtually identical to the previous permit issued on May 21, 1998.

The discharge limits and conditions in effect at the time of expiration of the previous permit are carried over unchanged to this reauthorized permit. Assessment of compliance and inspections of the facility during the previous permit term indicate that the facility should not be placed on a high priority for permit renewal. The Department assigns a high priority for permit renewals in situations where water quality would materially benefit from a more stringent permit during the next five-year cycle.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows the Department to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during the Department's annual permit planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance. The public is notified and input is sought after the initial draft ranking has tentatively established which permits are likely to be completely renewed and which are likely to be reauthorized. All relevant comments and suggestions are considered before a final decision is made regarding the type of reissuance for each permit.

The only changes to the previous permit are the submittal date requirements. Submittal requirements from the previous permit that were completed and submitted and do not require additional or continued assessment were removed from this permit. The submittal dates for the other standard compliance and submittal requirements that have been carried over from the past permit into this reauthorized permit have been adjusted to the proposed permit schedule. The Department considered these submittals necessary in the previous permit and no information has come forward to cause a reconsideration of the submittal requirement.

Public notice of the availability of the draft reauthorized permit is required at least 30 days before the permit is issued [Washington Administrative Code (WAC) 173-220-050]. The fact sheet and draft permit are available for review (see Appendix A—Public Involvement for more detail on the Public Notice procedures).

After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file for the permit and parties submitting comments will receive a copy of the Department's response. Comments and the resultant changes to the permit will be summarized in the fact sheet addendum, Appendix D—Response to Comments.

IV. RECOMMENDATION FOR PERMIT ISSUANCE

The Department proposes that this permit be issued for five years.

APPENDIX A – PUBLIC INVOLVEMENT INFORMATION

The Department has determined to reauthorize a discharge permit to the applicant listed on page 1 of this fact sheet addendum. The permit contains conditions and effluent limitations that are described in the fact sheet.

Public notice of application was published on July 13, 2003, and July 20, 2003, in *the Aberdeen Daily World* to inform the public that an application had been submitted and to invite comment on the reauthorization of this permit.

The Department will publish a Public Notice of Draft (PNOD) on August 13, 2003, in *the Aberdeen Daily World* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet addendum, and fact sheet are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30-day comment period to the address above. The request for a hearing shall indicate the interest of the party and the reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific test followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from reauthorization of this permit.

The Department will consider all comments received within 30 days from the date of the PNOD indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone at (360) 407-6279, or by writing to the address listed above.

Response to Comments

Comments made by Frank Meriwether, Department of Health, to Carey Cholski via e-mail dated August 18, 2003.

Comment 1:

Major renovation and expansion of its collection system is not mentioned, which I understand may be a limitation of reissuance. In any case, Ecology may want to mention in some way the significant benefits that were derived from this collection system work, which included reclassification of portions of the beach for shellfish harvesting. Prior to the renovation, DOH closed portions of these beaches to shellfish harvesting due to the failing onsite sewage systems (which is why a Severe Public Health Hazard was declared). I am not sure how the collection system renovation/repair/expansion affected the actual and design flows to the plant, but Ecology may also wish to mention any substantive change in these flows in a manner which still allows for the reissuance of these permits.

Response 1:

We concur that the later stages of the Pacific Beach/Moclips wastewater system upgrade included sections of collection system that had a profound impact on the improvement in water quality at major shellfish bed sites. The project opened up a significant portion of shellfish beds in the Pacific Beach area to shellfish harvesting. This effort was a cooperative one by the Departments of Health Shellfish and Ecology, and the City of Pacific Beach.

Comments from Charles Marr, P.E., Assistant Director, Utilities Division, Grays Harbor County to Carey Cholski, Permit Coordinator for the Department of Ecology, Southwest Regional Office.

Comment 2:

The Pacific Beach/Moclips Sewer System is a small organization with only two people that operate it plus operate the Pacific Beach Water System and the Illahee/Oyehut Water System. Both of our people are off duty during the weekends and holidays so the pH and UV readings have not been tested or read during those times.

In order to do the recording of the pH and the UV each day (7 days per week) for the wastewater effluent, we would have to pay overtime for one of the operators to come in and do the pH test and read the UV. This would increase our operating costs substantially (possibly by as much as \$7,000 to \$10,000 per year) and that is an amount that a system this size can't afford. The current rate for monthly sewer service is \$33.50.

I am asking that the 7-day requirement of Section S-2, Monitoring Requirements be modified to 5 days per week and also not be required during the holidays. I spoke with Al Bolinger last week about this request. I also explained to him that if we have a severe water line break in one of our water systems, sometimes all of the tests don't get completed on schedule if both employees are called out. That was the case of July 7, 2003, when some of the tests weren't completed.

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Response 2:

We concur that the testing schedule for pH should be 5 days/week instead of 7 days/week. The requirement to test for UV dosage and rainfall has been eliminated from the new permit. The new permit has been modified to reflect these changes. The requirement to test for pH is for 5 out of the 7 days in a calendar week. In your case, the Department has not specified which days of the week those 5 days come from. If an operator wanted a 3-day weekend off, then an extra pH could be done on the previous Sunday.

The request for eliminating testing on holidays is being denied. If a holiday lands on a weekday, you can use the example mentioned above to make sure that tests are still performed 5 days a week.